

ATTACHMENT 1

LIMERICK GENERATING STATION
UNIT 1

Docket No. 50-352

License No. NPF-39

TECHNICAL SPECIFICATIONS CHANGE REQUEST

"Removal of Organizational Charts as Recommended by NRC
Generic Letter 88-06"

Supporting Information for Changes - 16 pages

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Philadelphia Electric Company, Licensee under facility operating License NPF-39 for Limerick Generating Station (LGS) Unit No. 1 hereby requests that the Technical Specification (TS) contained in Appendix A to the Operating License be amended. Proposed changes to the TS are indicated by the vertical bars in the margins of the pages contained in Attachment 2 and listed here: xxvi, 6-1, 6-2, 6-3, 6-4, 6-6, 6-9, 6-11, 6-12 and 6-22.

This Change Request is submitted primarily as a result of NRC Generic Letter (GL) 88-06 "Removal of Organization Charts from Technical Specification Administrative Control Requirements" which encourages licensees to propose changes to their TS to remove organizational charts from TS and replace them with descriptions of the organizational structure and characteristics which are important to safety. The proposed changes concern the Administrative Controls in Section 6.0, and do not affect any Limiting Conditions for Operation or Surveillance Requirements. The proposed changes in this Change Request are grouped into two categories. Each category of proposed changes includes a Description of Changes, a Safety Discussion and a Significant Hazards Consideration. Category 'A' proposed changes involve removing the onsite and offsite organizational charts from TS Sections 6.2.1 and 6.2.2, respectively. These proposed changes are consistent with the guidance provided in GL 88-06. Category 'B' proposed changes are miscellaneous administrative changes. The Change Request concludes with a common Environmental Impact Assessment and a List of proposed

changes which specifies the pages and paragraphs affected by the proposed changes in both categories.

Licensee requests that the proposed changes be effective as of the issuance date of the license amendment.

Description of Proposed Changes - Category 'A'

The removal of organizational charts from the TS is an improvement that was proposed on a lead-plant basis for the Shearon Harris plant and was endorsed by the Westinghouse Owners Group. The NRC approved this change for Shearon Harris on January 27, 1988. This change was reviewed as part of the NRC's program for improvements in TS. The objectives of that program were established by the NRC's "Interim Policy Statement on TS Improvements." As a result of these efforts, NRC GL 88-06 was issued on March 22, 1988 which encouraged licensees and applicants to propose changes to their TS to remove the organizational charts from the TS.

Implementing the guidance provided in GL 88-06 involves the following proposed changes:

1. Insert the following as TS paragraph 6.2.1.

"Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite

and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organizational positions. These relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Limerick Generating Station Quality Assurance Program.
- b. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President-Limerick Generating Station shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and

providing technical support to the plant to ensure nuclear safety.

- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures."
2. Remove the first sentence in paragraph 6.2.2 which reads "The unit organization shall be as shown on Figure 6.2.2-1 and:", and replace it with "The facility organization shall be subject to the following:". The remaining text of paragraph 6.2.2 remains unchanged, however, the paragraph's location has changed (now beginning page 6-2 and carrying over onto page 6-3).
3. Remove the "Nuclear Management Organizational Chart" shown as Figure 6.2.1-1.
4. Remove the "Organization for Conduct of Plant Operations Chart" shown as figure 6.2.2-1.
5. Revise the "Table of Contents" page xxvi to reflect deletion of Figures 6.2.1-1 and 6.2.2-1.

Safety Discussion - Category 'A'

Deletion of the organizational charts is accompanied by the addition of general administrative control requirements which describe the essential aspects of the organizational structure defined in the organizational charts. The additional administrative control descriptions are contained in the proposed paragraph 6.2.1.a through 6.2.1.d. They involve the designation of safety responsibilities and organizational freedom of the Health Physics, Training and Quality Assurance groups. The independence of the Quality Assurance group is further guaranteed by adherence to 10 CFR 50 Appendix B, Criterion I.

Removing the organizational charts from the TS will have a positive impact on safety by permitting us to implement changes to our organizational structure without prior NRC approval provided that the change meets the general administrative controls and organizational objectives specified in proposed paragraph 6.2.1. Consequently, enhancements to the organizational structure, as well as minor administrative changes such as position title revisions, can be implemented promptly upon identification of the need for the change. Safety is further enhanced by providing clear and concise definitions of responsibility for the Plant Manager and Vice President-LGS in the proposed paragraphs 6.2.1.b and 6.2.1.c, respectively.

Removing the organizational charts from the TS will not affect compliance with any NRC regulations. 10 CFR Section 50.36(c)(5) requires that provisions relating to organization and management, procedures, record keeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner be included in the facility TS. However, no particular requirements are established for the format or content of these administrative control TS.

Removing the organizational charts from the TS and replacing them with the proposed descriptive language will assure that organizational commitments continue to be defined and controlled. The LGS Quality Assurance Program, Chapter 17 of the LGS Final Safety Analysis Report (FSAR) contains detailed organizational charts and associated descriptions of individual and group responsibilities as they apply to the operation and support of the facility. Appendix B to 10 CFR 50 and 10 CFR 50.54(a)(3) govern changes to the organization as described in the Quality Assurance Program. The enforceability of this requirement is further enhanced by the proposed paragraph 6.2.1.a. Additionally, 10 CFR 50.34(b)(6) requires that the organizational structure, along with responsibilities and authorities, be included in the FSAR. Section 13 of the LGS FSAR contains the important organizational features currently depicted on Figures 6.2.1-1 and 6.2.2-1. This information is required by 10 CFR 50.71(e) to be maintained and updated

annually. Thus, even in the absence of the organizational charts from the TS, the onsite and offsite organizations will be established and maintained to assure operation of the facility in a safe manner.

Information Supporting a Finding of No
Significant Hazards Consideration - Category 'A'

- (1) The proposed Category 'A' changes do not involve a significant increase in the probability or consequences of any accident previously evaluated.

Removing the organizational charts from the TS and replacing them with more general language does not affect plant operation. The proposed changes do not increase or decrease the qualification, experience or training requirements of onsite or offsite nuclear personnel. Additionally, the proposed changes do not affect the shift crew composition or the facility management positions requiring an NRC license.

The LGS Quality Assurance Program contains detailed organizational charts and associated descriptions of individual and group responsibilities as they apply to the operation and support of the LGS facility. Appendix B to 10 CFR 50 and 10 CFR 50.54(a)(3) govern changes to the organization as described in the Quality

Assurance Program. 10 CFR 50.34(b)(6) requires that the organizational structure also be included in the FSAR. Section 13 of the FSAR provides a description of the organization and detailed organizational charts. As required by 10 CFR 50.71(e), this information must be maintained and updated annually. Based on this review, it is concluded that the proposed Category 'A' changes do not involve a significant increase in the probability or frequencies of any accident previously evaluated.

- (2) The proposed Category 'A' changes do not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed changes are administrative in nature, and do not involve any physical alterations of plant configurations or changes to setpoints, or operating parameters. It is therefore concluded that removing the organizational charts from the TS does not create the possibility of a new or different kind of accident from any previously evaluated.

- (3) The proposed Category 'A' changes do not result in a significant reduction in the margin of safety.

Removing the organizational charts from the TS enhances the margin of safety by permitting an organizational change without

prior NRC approval provided that the objectives of proposed paragraph 6.2.1 are met, thereby allowing a more timely response to situations where the appropriate action is a prompt organizational change. Safety is maintained by providing clear and concise definitions of responsibility for the Shift Supervisor, Plant Manager and Vice President-LGS.

Further, the proposed changes include additional administrative controls which capture the essential aspects of the material being removed such that the associated requirements will continue to be met. Based on this review, it is concluded that the proposed Category 'A' changes do not result in a significant reduction in the margin of safety, but improve the margin of safety.

Description of Changes - Category 'B'

The following administrative changes are proposed:

1. Revise paragraphs 6.2.3.1, 6.5.2.1, 6.5.2.2, 6.5.2.8.g, 6.5.2.9.a, and 6.5.2.9.b to reflect the new organization under the Executive Vice President-Nuclear.
2. Revise paragraph 6.5.2.1 to indicate that the Nuclear Review Board (NRB) reports to and advises only the

Executive Vice President-Nuclear and not the Office of the Chief Executive.

3. Revise paragraph 6.5.2.9.c to indicate that NRB audit reports shall be forwarded to the Corporate Officer(s) responsible for the areas audited instead of the Executive Vice President-Nuclear.
4. Revise paragraph 6.2.3.2 and 6.2.3.4 to reflect title changes and the deletion of the corporate Independent Safety Engineering Group (ISEG).
5. Revise paragraph 6.14.2 by removing the Engineer-In-Charge Nuclear and Environmental Section in order to remove unnecessary detail concerning the technical review of the Offsite Dose Calculation Manual.

Safety Discussion - Category 'B'

Proposed Change #1 reflects a change to the organization under the Executive Vice President-Nuclear. The position of Senior Vice President-Nuclear Power has been abolished.

Proposed Change #2 reflects the formation of the Nuclear Committee of the Board (NCB). The function of NCB is to advise and assist the Board of Directors in the proper and complete discharge of its responsibilities for oversight of the Company's nuclear

operations. The Chairman of the NRB will meet directly with the Chairman of the NCB, and will meet directly with the NCB at least once annually. The Office of the Chief Executive will be made aware of NRB activities by both the Executive Vice President-Nuclear and the Board of Directors. The Executive Vice President-Nuclear reports directly to the Office of the Chief Executive and, in accordance with TS 6.5.2.9, receives reports and advice from the NRB. The Board of Directors receives reports from the NRB through the NCB. We have therefore concluded that having the NCB and the Executive Vice President-Nuclear available to advise the Office of the Chief Executive will assure sufficient corporate management involvement in nuclear plant safety.

Proposed Change #3 assigns a more appropriate level of corporate management as the recipients of NRB audit reports. Licensee proposes that the audit reports be forwarded to Corporate Officers responsible for the areas audited rather than to the Executive Vice President-Nuclear. The Corporate Officers have a closer proximity to the sources of problems and therefore can take prompt corrective actions. This proposed change will not lessen the awareness of the Executive Vice President-Nuclear. If NRB audit findings are not satisfactorily addressed by the Corporate Officers, the NRB may inform the Executive Vice President-Nuclear through its normal communication channel as defined in TS 6.5.2.1.

Proposed Change #4 reflects the deletion of the corporate ISEG. The deletion of the corporate ISEG requires that the two dedicated full time corporate ISEG engineers be transferred to the LGS ISEG group. This change is reflected in paragraph 6.2.3.2. Additionally, as a result of this change the position of ISEG manager is deleted and the LGS ISEG now reports to the General Manager - Nuclear Quality Assurance, as reflected in paragraphs 6.2.3.2 and 6.2.3.4. This change does not diminish the effectiveness of the ISEG as the ISEG Manager ultimately reports to the General Manager - Nuclear Quality Assurance.

Proposed change #5 is proposed to delete unnecessary detail from the TS. Nevertheless, the PORC will continue to review the ODCM as required and perform the necessary safety review for LGS.

Information Supporting a Finding of No
Significant Hazards Consideration - Category 'B'

An example (Example i) provided by the Commission of a change involving no significant hazards consideration, as stated in 51 FR 7751 is "purely administrative change to the TS". The proposed changes contained in Category 'B' conform to this example and do not constitute a significant hazards consideration in that:

- (1) The proposed Category 'B' miscellaneous changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

Replacing the Senior Vice President-Nuclear Power with the Executive Vice President-Nuclear will not decrease the quality of leadership of the Nuclear Group.

Sufficient corporate management involvement in nuclear plant safety will be maintained with the elimination of the direct reporting requirement of the NRB to the Office of the Chief Executive. The Office of the Chief Executive will be made aware of NRB activities by the Nuclear Committee of the Board through the Board of Directors and by the Executive Vice President-Nuclear.

Designating Corporate Officers responsible for the areas audited instead of the Executive Vice President-Nuclear as the recipients of NRB audit reports is a more appropriate initial level of review. The Corporate Officers have a closer proximity to the sources of problems and therefore can take prompt corrective actions. If NRB audit findings are not satisfactorily addressed by the Corporate Officers, the NRB may inform the Executive Vice President-Nuclear through its normal communication channel as defined in TS 6.5.2.1.

Chapter 15 of the LGS FSAR has been reviewed to determine the effect of the proposed administrative changes on previously evaluated accidents. It is concluded that the accident analyses in Chapter 15 of the FSAR are not affected by the proposed miscellaneous changes. For this reason, as well as the reasons presented above, it is concluded that these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (2) The proposed Category 'B' miscellaneous changes do not create the possibility of a new or different kind of accident from any previously evaluated.

The implementation of these miscellaneous changes will not affect the interpretation or intent of the specifications they involve (6.2.3.1, 6.5.2.1, 6.5.2.2, 6.5.2.8 and 6.5.2.9). These changes are purely administrative and do not involve any hardware changes or plant modifications. Therefore, these changes will not create the possibility of a new or different kind of accident from any previously evaluated.

- (3) The proposed Category 'B' miscellaneous changes do not involve a significant reduction in a margin of safety.

The administrative nature of these changes will not impact plant systems or operation. For this reason, as well as the reasons presented in the Safety Assessment and in response to item 1 above, it is concluded that these changes will not involve any significant reduction in a margin of safety.

Environmental Impact Assessment

An environmental impact assessment is not required for the changes proposed by this Change Request because the changes conform to the criteria for "actions eligible for categorical exclusion" as specified in 10 CFR 51.22(c)(9). The proposed changes do not involve any systems that have a direct relationship with the environment. This Change Request involves no significant change in the types or significant increase in the amounts of any effluents that may be released offsite and there will be no significant increase in individual or cumulative occupational radiation exposure.

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes to the TS and have concluded that they do not involve unreviewed safety questions and will not endanger the health and safety of the public.

List of Proposed Changes

<u>Section Affected</u>	<u>Proposed Changes</u>
Page xxvi	Designate Figures 6.2.1-1 and 6.2.2-1 as deleted.
Page 6-1 Paragraph 6.2.1	Change title OFFSITE to Offsite and Onsite Organizations. Delete existing sentence 6.2.1 and add specifications 6.2.1.a through 6.2.1.d as recommended in GL 88-06.
Paragraph 6.2.2	Replace "as shown on Figure 6.2.2-1 and: " with "subject to the following:." (Note: Although the text in the remainder of the paragraph remains unchanged, revision bars indicate a change in location.
Page 6-3 Figure 6.2.1-1	Delete the Nuclear Management Organizational Chart. Include overflow words from old page 6-2 for "Unit Staff".
Page 6-4 Figure 6.2.2-1	Delete the Organization for Conduct of Plant Operations Chart.
Page 6-6 Paragraph 6.2.3.1	Replace "Senior Vice President-Nuclear" with "Executive Vice President-Nuclear."
Paragraph 6.2.3.2	Change the word "three" to "five" and delete the description of qualifications for Corporate ISEG engineers. Change "Independent Safety Engineering Manager" to "General Manager-Nuclear Quality Assurance".
Paragraph 6.2.3.4	Change "Independent Safety Engineering Manager" to "General Manager-Nuclear Quality Assurance".
Page 6-9 Paragraph 6.5.2.1	Replace "Senior Vice President -Nuclear" with "Executive Vice President-Nuclear" and remove "and the Office of the Chief Executive."

Paragraph 6.5.2.2 Replace "Senior Vice President
-Nuclear" with "Executive
Vice President-Nuclear".

Page 6-11

Paragraph 6.5.2.8(g) Replace "Senior Vice President
-Nuclear" with "Executive
Vice President-Nuclear".

Page 6-12

Paragraph 6.5.2.9(a) Replace "Senior Vice President
-Nuclear" with "Executive
Vice President-Nuclear".

Paragraph 6.5.2.9(b) Replace "Senior Vice President
-Nuclear" with "Executive
Vice President-Nuclear".

Paragraph 6.5.2.9(c) Replace "Senior Vice President
-Nuclear" with "Corporate Officer(s)."

Page 6-22

Paragraph 6.14.2 Delete reference to "Engineer-In-Charge
Nuclear and Environmental Section".